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January 30, 2006

**Via Facsimile &  
U.S. First-Class Mail**

Jerome J. Kaharick, Esquire  
Michael J. Csonka, Esquire  
Wallace Building  
Suites 301-302  
406 Main Street  
Johnstown, PA 15901

RE: **Valerie Hanes v. Elk Regional Medical Center  
C.A. No. 05-135E; In the United States District Court  
for the Western District of Pennsylvania**

Dear Mr. Kaharick:

We served you with Defendant's First Set of Interrogatories and Requests for Production of Documents on November 11, 2005. To date, we have not received Plaintiff's responses to these written discovery requests. Kindly forward Plaintiff's answers and responses to our written discovery requests by **Friday, February, 3, 2006**.

Moreover, I tentatively scheduled Ms. Hanes' deposition for February 22, 2006 beginning at 9:30 am in accordance with the enclosed Notice of Deposition, but will reschedule it for another mutually agreeable time during either the week of February 13<sup>th</sup> or the week of February 20<sup>th</sup> if necessary. Please advise me immediately if you require us to reschedule it within this two week period.

In light of our impending discovery deadline of February 24<sup>th</sup>, receipt of Plaintiff's responses by February 3<sup>rd</sup> is imperative for any meaningful deposition of Ms. Hanes between now and February 24<sup>th</sup>. We fully anticipate your willingness to provide Plaintiff's discovery responses, but please note that any failure to do so will necessitate court intervention. We are hopeful that such court intervention will be unnecessary.

Thank you for your prompt attention to these matters and we look forward to receipt of Plaintiff's discovery responses. In the meantime, do not hesitate to contact me if you require further clarification or would otherwise desire to discuss this case.

**Cohen & Grigsby, P.C.**

Jerome J. Kaharick, Esquire


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Please do not hesitate to contact me with any questions or comments you may have.

Very truly yours,

COHEN & GRIGSBY, P.C.

By:   
W. Scott Hardy

WSH/dms

Enclosure

cc: Valerie S. Faeth, Esq.

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